



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

February 4, 2019

BY ECF

The Honorable Richard J. Sullivan
United States Circuit Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Raheem J. Brennerman*, 17 Cr. 337 (RJS)

Dear Judge Sullivan:

Pursuant to the Court's January 28, 2019 order directing ICBC (London) plc to file a supplemental affidavit in support of its request for attorneys' fees, enclosed is an affidavit by Paul Hessler, Esq., counsel for ICBC, which set forth the bases for ICBC's request for a restitution award including attorneys' fees in the amount of \$771,378.38.

The Government respectfully requests that it be permitted to file a response, by February 8, 2019, setting forth its view as to whether the attorneys' fees sought by ICBC, or a portion of those fees, may be awarded under the Mandatory Victim Restitution Act, 18 U.S.C. § 3663A.

Respectfully submitted,

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